

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI, ET AL.,

CIVIL ACTION NO. 3:22-cv-01213

VERSUS

JUDGE: TERRY A. DOUGHTY

JOSEPH R. BIDEN, ET AL.

**MAGISTRATE JUDGE: KAYLA D.
MCCLUSKY**

DECLARATION OF CHARLENE BOLLINGER

I, Charlene Bollinger, declare as follows:

1. My husband Ty and I are two of the four individual Applicant-Interveners, and founders of an affiliated public health advocacy organization, on whose behalf this Motion has been filed. This declaration is made in support of the Applicants' Notice of Motion and Motion to Intervene for Access to Discovery and for its Filing as Judicial Record, or for *In Camera* Inspection in *Missouri v. Biden, et al.* No. 3:22-cv-01213-TAD-KDM. If called as a witness, I could and would testify competently to the facts herein, except as to those matters stated on information and belief.

2. Ty and I are the co-founders and owners of The Truth About Cancer, CancerTruth, The Truth About Vaccines, and The United Medical Freedom SuperPac, which are, inter alia, public health advocacy organization. Through those entities and in our individual capacity, Ty and I are online Covid 19-news publishers whom the federal government defendants in this case have censored on major social media platforms. These defendants have engaged in

such censorship in order to curb our deeply-felt, and fact-based criticism of the government's response to the Covid-19 pandemic and to silence our disfavored facts and opinions concerning a variety of subjects, including: Covid 19's lab-leak origin, the comparative benefits of early treatment and natural immunity, and the risks or inefficacy of Covid-19 vaccines mandated under emergency use authorizations.

3. We are Christians, authors, filmmakers, and health-freedom advocates. We currently reside in Tennessee. We make films and write books to bring awareness to real health solutions and advocate for the right to self-determination of all Americans and all citizens of the world. We have published a New York Times Best Selling book, *The Truth About Cancer*, which has sold over 250,000 copies and helped countless people treat and beat their cancer and regain their health. Our films cover different solutions for health and wellness, and advance public conversation and understanding on this vital issue. We regard being able to help so many people around the world as the fulfillment of a calling and a blessing beyond measure. Ty and I have received countless testimonies from readers and viewers who were sent home to die, but who are alive and well after watching our films or reading our books. Ty and I have featured doctors and scientists who are on the cutting edge of saving lives. We have enjoyed using social media platforms to stay in touch with their many fans and connect with other influencers to spread information that fosters health freedom and solutions.

4. Ty and I were de-platformed from five Twitter channels shortly after March 30, 2021 where we had tens of thousands of followers on each channel. We were also de-platformed from *The Truth About Vaccines* Instagram on March 25, 2021; from our personal Instagram on October 21, 2021; from *The Truth About Vaccines* YouTube on May 17, 2021; from *The Truth About Cancer* YouTube on July 22, 2021, where we had over 200,000 subscribers and had had

over 40 million views of that channel; we were also de-platformed from The Truth About Cancer Vimeo on November 9, 2021; and most recently, Ty and I were de-platformed from The Truth About Vaccines Vimeo on May 13, 2022. We continue to be heavily shadowbanned on Facebook.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in Nashville, Tennessee on November 16, 2022.


CHARLENE BOLLINGER